

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY and
ERICA GREEN,

Plaintiffs,

- against -

U.S. DEPARTMENT OF EDUCATION,

Defendant.

X

:

:

:

Case No. 19-cv-00693

:

:

X

DECLARATION OF ALEXANDRA PERLOFF-GILES

I, Alexandra Perloff-Giles, hereby declare under penalty of perjury as follows:

1. I am an attorney at The New York Times Company (“The Times”).
2. On May 8, 2020, Alexander Hogan, counsel for Defendant Department of Education, sent me an e-mail, stating that he was “attaching here several records that, upon review, DOE is now disclosing.” Attached to that e-mail was a 16-page PDF document.

Date: June 8, 2020

/s/ Alexandra Perloff-Giles

Alexandra Perloff-Giles

Legal Department

The New York Times Company

620 8th Avenue

New York, NY 10018

Phone: (212) 556-7783

Fax: (212) 556-4634

E-mail: aperloffgiles@nytimes.com

Attorney for Plaintiffs